

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

Unisys Corporation,

Plaintiff,

vs.

Leon Gilbert and Michael McGarvey,

Defendants.

Civil Action No. 2:23-CV-00555-PD

JURY TRIAL DEMANDED

**JOINT STIPULATION FOR AN EXTENSION OF TIME FOR DEFENDANTS TO RESPOND  
TO UNISYS'S MOTION FOR A TEMPORARY RESTRAINING ORDER**

On February 13, 2023, Unisys Corporation (“Unisys”) filed a complaint alleging claims of trade secret misappropriation and breach of contract against Defendants Leon Gilbert and Michael McGarvey (collectively, “Defendants”) (Dkt. 1). On the same day, Unisys filed a motion for a temporary restraining order, requesting that Defendants be enjoined from misappropriating Unisys’s trade secrets and breaching their contracts with Unisys (Dkt. 4).<sup>1</sup> The Court ordered Defendants to respond to Unisys’s TRO by February 16, 2023 at 5:00 pm. Dkt. 9.

On February 15, 2023, Defendants, through their counsel, reached out to Unisys and requested an extension until February 20, 2023 at 5:00 pm to respond to the TRO. Defendants agreed not to rely on the extension as a defense to the TRO. Defendants’ counsel also agreed to accept service on behalf of Mr. Gilbert and Mr. McGarvey. Unisys does not oppose Defendants’ request for an extension.

Therefore, the parties jointly submit this stipulation, subject to the Court’s approval, for

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<sup>1</sup> On February 14, 2023, Unisys requested that minor corrections be made to the complaint, an exhibit to the complaint, and an exhibit to the TRO. The corrected documents were placed on the docket on February 14, 2023. Dkt. 8.

Defendants' time to respond to the TRO to be extended to February 20, 2023 at 5:00 pm.

DATED: February 15, 2023

Respectfully submitted,

/s/ Julian C. Williams

Julian C. Williams (S.B.N. 324771)  
julian.williams@morganlewis.com  
MORGAN, LEWIS & BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103  
Phone: (215) 963-5000  
Fax: (215) 963-5001

Robin Nunn (admitted *pro hac vice*)  
robin.nunn@morganlewis.com  
MORGAN, LEWIS & BOCKIUS LLP  
101 Park Avenue  
New York, New York 10178  
Phone: (212) 309-6779  
Fax: (212) 309-6001

Michael W. De Vries (admitted *pro hac vice*)  
michael.devries@kirkland.com  
California S.B.N. 211001  
KIRKLAND & ELLIS LLP  
555 South Flower Street, Suite 3700  
Los Angeles, CA 90071  
Telephone: (213) 680-8400

Adam R. Alper (admitted *pro hac vice*)  
adam.alper@kirkland.com  
California S.B.N. 196836  
KIRKLAND & ELLIS LLP  
555 California Street  
San Francisco, CA 94104  
Telephone: (415) 439-1400

Gianni Cutri (admitted *pro hac vice*)  
gianni.cutri@kirkland.com  
Illinois S.B.N. 6272109  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Telephone: (312) 862-2000

Leslie M. Schmidt (admitted *pro hac vice*)  
New York S.B.N. 4884078  
leslie.schmidt@kirkland.com

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KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 446-4800

*Attorneys for Plaintiff*  
Unisys Corporation

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**CERTIFICATE OF SERVICE**

I do hereby certify that on this date, I caused true and correct copies of the foregoing document to be served on Defendants via electronic mail

DATED: February 15, 2023

/s/ Julian C. Williams

Author